

Document Log Item

Addressing	
From	To
"Ferrario, Nedzlene N." <NNFerrario@SolanoCounty.com>	"Chan, Victor M." <VMChan@SolanoCounty.com> Adam Freedman/R9/USEPA/US@EPA
CC	BCC
David Albright/R9/USEPA/US@EPA George Robin/R9/USEPA/US@EPA "Leland, James H." <JHLeland@SolanoCounty.com>	
Description Form Used: Memo	
Subject	Date/Time
RE: Blow-Out Prevention Permit Language	©)x ¢v%
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Comments	

Body

Document Body

Adam,

Because safety is an issue in the community's mind, ours and in CEQA's environmental review, the anti-blow out prevention system is key safety feature. Therefore, the County requested a schematic from the applicant and once we receive it we will forward it over

for your review and concurrence. I have spoken with Damonica Pierson about preparing the schematic and they have agreed to provide.

In addition, I think it would be beneficial for us to coordinate the use permit, CEQA environmental and UIC review. I foresee several of EPA requirements could become our environmental mitigation measures i.e. anti-blow out measure, designing the Class V well to Class 1 stds.

Perhaps during the UIC permit review, provide us a letter indicating how the proposal specifically meets or exceeds EPA standards.

On another note, the County's timelines are dependent upon Shell providing us a qualitative risk assessment which includes risk to induced seismic activity, groundwater aquifer and natural gas reservoirs nearby. Such issues were raised during the Open House (about 100-110 people attended). I expect to receive such materials from Shell by the end of the month or later, and will forward them to you for review as well.

Best Regards,

Ned

From: Chan, Victor M.
Sent: Monday, February 01, 2010 8:48 AM
To: Freedman.Adam@epamail.epa.gov; Ferrario, Nedzlene N.
Cc: Albright.David@epamail.epa.gov; Robin.George@epamail.epa.gov
Subject: RE: Blow-Out Prevention Permit Language

Adam. There are discussions in Solano County about having a MOU between Solano County and US EPA to prevent regulatory duplication. For example, our Use permit may state: "Blowout prevention is required and must be consistent with the US EPA permit." There are other issues that require clarification. If you are receptive to an MOU, this may streamline the process. Vic

From: Freedman.Adam@epamail.epa.gov [mailto:Freedman.Adam@epamail.epa.gov]
Sent: Friday, January 29, 2010 5:02 PM
To: Chan, Victor M.; Ferrario, Nedzlene N.
Cc: Albright.David@epamail.epa.gov; Robin.George@epamail.epa.gov
Subject: Blow-Out Prevention Permit Language

Victor and Ned,

I wanted to show you how our current permit language addresses blow-out prevention (BOP), as I noted that your information request of Shell includes specifics pertaining to their BOP design. The language is draft and submit to change during our permit writing process.

1. Drilling, Work-over, and Plugging Procedures

Drilling, work-over, and plugging procedures must comply with the CDOGGR “Onshore Well Regulations” of the California Code of Regulations, found in Title 14, Natural Resources, Division 2, Department of Conservation, Chapter 4, Article 3, Section 1722-1723. Drilling procedures shall also include the following:

- (a) Details for staging long-string cementing or justification for cementing without staging;
- (b) Records of daily Drilling Reports (electronic and hard copies);
- (c) **Blowout Preventer (BOP) System testing on recorder charts including complete explanatory notes during the test(s),**
- (d) Casing and other tubular and accessory measurement tallies; and
- (e) Details and justification for any open hole gravel packing.

The "Onshore Well Regulations" that we cite in our permit may be found at <ftp://ftp.consrv.ca.gov/pub/oil/regulations/PRC04.PDF>-- and the applicable language is on page 29, with specific guidances on design found in DOGGR publication No. MO 7, as noted below.

1722.5. Blowout Prevention and Related Well Control Equipment.

Blowout prevention and related well control equipment shall be installed, tested, used, and maintained in a manner necessary to prevent an uncontrolled flow of fluid from a well. Division of Oil, Gas, and Geothermal Resources publication No. MO 7, “Blowout Prevention in California,” shall be used by Division personnel as a guide in establishing the blowout prevention equipment requirements specified in the Division’s approval of proposed operations.

Please let me know if you have any further questions and I would be happy to discuss them.

Adam Freedman
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